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November 16, 2001

Office of the United States Trade Representative

Dear Sir or Madam:

This is a request that the following be excluded from any additional duties, tariffs, or quotas as it relates to the 201 investigation, specifically 66 FR 54321.

The following is the information you have asked for.

(a) X22CrMnNi 20-8-5 (Krupp 105MA)

X22CrMnNi 25-9-5 (Krupp 115MA)

X22CrMnNi 17-8-4 (Krupp 85MA)

X10CrAlSi 13 (Ferrotherm 4724)

X10CrAlSi 18 (Ferrotherm 4742)

(b) See attached Specifications.

(c) As a chain manufacturer, we require "rod by coil" for our chain making machines, and these products are not produced in the USA from what we have determined. To buy in "bar" form, which is available would be far more costly to manufacture in our equipment.

(d) Krupp Edelstahlprofile GmbH

Germany

(e) Products before 2001 were produced in our Division in Richmond B.C., and consequently used bar from a US supplier. The projected usage for the "rod by coil" is as follows.

<u>Product</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>
(1) X22 CrMnNi 20-8-5	120T	120T	132T	132T	132T

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(2) X22 CrMnNi 25-9-5	90T	90T	99T	99T	99T
(3) X22 CrMnNi 17-8-4	3T	3T	4T	4T	4T
(4) X10 CrAlSi 13	7T	7T	8T	8T	8T
(5) X10 CrAlSi 18	3T	3T	4T	4T	4T

(f) None that we know of.

(g) None that we know of.

The above usages are in US tons (2000 LB)

Sincerely,

Lewis E. Schulz  
Corporate Commodity Manager